DOCUMENT RESUME

ED 225 259 EA 015 277

AUTHOR Hansen, Kenneth H.
TITLE State Accreditation/Approval of Schools: An Overview of Practice and Policy Issues in the Northwest Regional Educational Laboratory Region.
INSTITUTION Northwest Regional Educational Lab., Portland, OR. Northwest Center for State Educational Policy Studies.
PUB DATE Mar 81
NOTE 16p.
PUB TYPE Viewpoints (120) -- Reports - Descriptive (141)

EDRS PRICE MF01/PC01 Plus Postage.
DESCRIPTORS *Accreditation (Institutions); *Agency Role; Educational Policy; Elementary Secondary Education; Geographic Regions; *State Departments of Education
IDENTIFIERS *United States (Northwest)

ABSTRACT

The procedures followed in the accreditation of public and private schools in each of six northwestern states were examined to determine how current practices differed and what problems were perceived, and to help develop reasonable policy options for improvement. The first section of this report considers the legal basis for accreditation in the states, levels of approval or accreditation, the development and nature of accreditation criteria, the relationships of the state education agencies with other accrediting agencies, and the regulation of compliance. The second section notes several accreditation issues about which state agencies indicated some concern: accreditation of small private schools, the costs of accreditation programs, the state agency's dual role as accreditor and provider of technical assistance, and the question of what to measure when accrediting programs. The suggestions offered to state agencies in the report's third section include giving private school accreditation high priority, giving accreditation of elementary and junior high schools attention equal to that given high schools, lowering the profile of the state agency as an enforcer of standards, and shifting the agency's emphasis from the maintenance of minimum standards to active improvement of the schools. (Author/PGD)

****
* Reproductions supplied by EDRS are the best that can be made *
* from the original document. *
****

U.S. DEPARTMENT OF EDUCATION
NATIONAL INSTITUTE OF EDUCATION
EDUCATIONAL RESOURCES INFORMATION CENTER (ERIC)

X This document has been reproduced as received from the person or organization originating it.

☐ Minor changes have been made to improve reproduction quality.

• Points of view or opinions stated in this document do not necessarily represent official NIE position or policy.

"PERMISSION TO REPRODUCE THIS MATERIAL HAS BEEN GRANTED BY

M. Margaret Rogers

TO THE EDUCATIONAL RESOURCES INFORMATION CENTER (ERIC)."

ED225259

STATE ACCREDITATION/APPROVAL OF SCHOOLS:

An Overview of Practice and Policy Issues in the Northwest Regional Educational Laboratory Region

March 1981

Kenneth H. Hansen
Principal Author

Northwest Center for State Educational Policy Studies

A Pilot Project of the

Northwest Regional Educational Laboratory
710 S.W. Second Avenue
Portland, Oregon 97204

EA 015 277

STATE ACCREDITATION/APPROVAL OF SCHOOLS:

An Overview of Practice and Policy Issues in the NWREL Region

Introduction

State education agencies have historically had responsibility for general supervision of the school systems of the states. Approving or accrediting public (and sometimes private) schools or school systems has been one generally accepted means of exercising appropriate state level control over educational quality. Increasingly, however, there is concern both at the state and local levels about the appropriateness and effectiveness of traditional patterns of school accreditation and approval.

The questions being raised are generally ones that indicate concern or uneasiness, not overt dissatisfaction, with present approval/accreditation procedures. Questions about the balance between state and local control, about the requirements for accountability at the state level and the necessity for maximum freedom at the local level, about the inclusion of private as well as public schools in the approval/accreditation process--these are legitimate and even urgent policy issues.

To set some of these policy questions into a reasonable framework for consideration, the Chief State School Officers of the six states within the primary service area of the Northwest Regional Educational Laboratory asked the Lab, through its Center for State Studies, to explore the problem and to present some analysis of the policy issues facing the states.

In response to this request of the Northwest and Pacific Chiefs, visits were made to the six states involved (Alaska, Hawaii, Idaho, Montana, Oregon and Washington) to discuss approval/accreditation practices in each state with the Chiefs and appropriate key staff, and to examine some of the state materials used to gather and evaluate program information from local school districts. This study was not intended to be a comprehensive or exhaustive survey, but an attempt to get a look at (a) current practices (for an overview and comparison among the states), (b) perceived problems (for a distinction between those unique to a given state and those common to all), and (c) suggested possibilities for improvement (to identify reasonable policy options).

This paper does not attempt to present a state-by-state comparison of program details; the focus is on policy issues and some potential policy options. Moreover, comparative state data would have little significance, since each state operates under different statutes, organizational structures, historical considerations, and local/state customs. Additionally, a number of the states are in the process of changing rules, requirements, and documentation in their approval/accreditation procedures; current specific reports would be soon outdated.

Nevertheless, from the visits made and discussions held, there does emerge a fairly clear picture of common practice found in the several states; from this body of common practice there can be identified some common problems and some potential options for consideration by the individual SEA.

I. Current Practice

Legal basis. In each of the states, there exists stated constitutional authority for the state, through the SEA, to exercise broad supervisory or oversight authority over the public schools of the state, an authority made more explicit by specific statute, and usually spelled out in even greater detail in Board of Education or departmental regulations having the force of law. This authority generally carries with it both the responsibility for approving schools--permitting them to operate--and for accrediting at least the secondary schools--making some assessment of quality.

Legal authority over private schools varies in statutory specificity, and varies greatly in the way it is actually exercised. In some states, private schools must have specifc state approval to exist at all; in others they must "register" with the state; in others they may request formal accreditation; and in others the state virtually ignores them except as it may be enforcing some other related law. For example, all states have some sort of compulsory attendance law, so the state has a degree of obligation to see that all children are in a "school" that actually is a school. State certification of private school teachers is generally required, but there is a baffling array of variations in methods of enforcing both compulsory attendance and teacher certification laws. In one state, the local board is charged with ascertaining whether students in private schools are getting a "comparable" education; in another, private schools need meet no state standards at all if student scores on standardized tests equal or exceed state averages. Some of the other complexities of the private school issue will be discussed in subsequent sections of this paper.

Levels of approval or accreditation. Generally, state approval of schools is pretty much a yes/no proposition. A school is authorized to operate provided it has sufficient enrollment, meets health and safety standards, uses certified teachers, and complies with other state laws; otherwise it may not operate. It may be "approved" or "not approved;" "standard" or "non-standard;" "accredited" or "non-accredited." However, there is almost always provided some temporary or transitional relief: in a state which provides that even one non-standard item makes the whole school non-standard, there is still a provision for a status called "conditionally standard" for a limited period of time. Most accreditation schemes call for a grace period of being "advised" or "warned" before the axe falls. But generally there are no levels, as once was common, which designate schools as Class A, B, or C. You're either in or out!

That is, there is no formal status of being superapproved or superaccredited, though at least a couple of states do suggest specifically that schools can attain a measure of internal satisfaction by exceeding the standards in specified ways, even though the state gives no formal recognition of the superior state of quality or excellence.

Development of accreditation criteria. State initiated accreditation criteria (as distinguished from those provided by regional accrediting associations) are generally developed cooperatively over a fairly long period of time--two years or even more of public hearings, committee deliberations, and final technical revision by SEA staff prior to ultimate Board approval is a fairly common pattern. Usually, the entire "education family" is involved: parents, teachers, administrators, professional associations, higher education representatives, and often students contribute to at least the initial drafting of the proposed

standards. There is perhaps--and this is surely commendable--more commonality among the states in the thoughtful, wide ranging methods of standards development than there is in any other aspect of the accreditation process.

Criteria resulting from the development process. In every state visited, the approval/accreditation criteria are widely publicized and readily available. The format varies widely, presumably in response to needs as perceived by the state. Whether brief or elaborate, the lists can be very roughly divided into two kinds: those which prescribe certain conditions which should be met and those which describe certain outcomes which are desired. It is tempting to distinguish between these two sorts of lists as "input" and "output" models, but this is probably an oversimplification. In fact, one state has suggested a combined input/output model as one of the several optional accreditation plans offered. At any rate, the criteria usually end up in the form of checklists which indicate simply the school's compliance or noncompliance with each item.

The SEA and other accrediting agencies. At the secondary school level, most SEAs in the Northwest have an extremely close tie-in with the major regional accrediting association, often accepting its standards, participating with association representatives in the onsite visitation teams, providing with the department a sort of secretariat for the association, and sometimes accepting Northwest accreditation as meeting automatically the state requirements.

The SEA also shares with other state government agencies some of the responsibilities for school approval. In one state, an independent Teacher Standards and Practices Commission oversees all questions of teacher certification; in all states, to some extent at least, provisions at the local level for the health, safety, and welfare of children are subject to approval of appropriate state agencies not a part of the Department of Education. Enforcement of such state regulations as they affect private schools, however, is sometimes quite sporadic, in part because the existence of smaller, often rather impermanent non-public schools is difficult to determine. If you can't find 'em, you can't regulate 'em!

Monitoring and compliance assurance. Since formal team visitation for accreditation occurs, typically, only every five or ten years, states must place primary reliance for monitoring of school quality upon the perusal of required written annual reports from local schools or school districts. These annual reports may be primarily intended, for purposes other than formal accreditation--reports designed, for instance, to assure compliance with various state laws concerning the length of the school day or the school year, inclusion of or appropriate emphasis on required curricular areas, or the assignment of teachers according to their areas of certification. These reports, when carefully analyzed, can serve as some indication of overall school quality. Often, however, the reports appear to be prepared and reviewed somewhat routinely; time and staff may not be available to check more than a random sampling; and since they are based on locally self-determined and hence potentially self-serving information, their complete accuracy may be suspect.

Therefore, in addition to locally generated reports or written assurances that the laws are being complied with, direct SEA visitation is often used as a cross-check. (Since such visitations are usually made in conjunction with SEA "technical assistance" calls, the roles of the SEA personnel as both helpers and inspectors can become somewhat confused; more will be said of this later.) Another monitoring device in use in at least one of the states is provision for formal charges to be brought against the school by means of voluntary citizen complaint, first at the local and then at the state level. If the charges of noncompliance with state standards are upheld, the school faces revocation of its approved standing.

Again, with respect to private schools there is often minimal monitoring, for a number of very understandable reasons. First of all, despite what state laws may permit or require, there is a natural reluctance to involve the state any more directly in the affairs of non-public education than is absolutely necessary. Furthermore, SEA personnel have scarcely the time to get around to all of the public schools on a regular, much less frequent, basis. And finally, if deficiencies or outright violations are found in the private schools, the sanctions available to the SEA are relatively few and quite difficult to enforce.

Sanctions for noncompliance. If a public school or district is found by the SEA to be in substantial noncompliance with approval or accreditation standards, revocation--or even threat of revocation--of approval is often sufficient to initiate the changes needed to bring the school back up to standard. After all, no school administration finds it very comfortable to have to explain why it is in trouble with the state;

and few communities are content to be unapproved, non-standard, or dis-accredited. In at least one of the states where accreditation is entirely voluntary, a school can simply choose not to participate at all in the accreditation process; but even in this case, the school must comply with all state laws to prevent loss of funds, and loss of face. Even many private schools--and especially those that have spent many years in building a reputation for quality--not only want but need to be fully approved and accredited in order to continue to attract the kind of students they seek.

There are instances, however, when merely taking the school off the approved or accredited list is not enough; real penalties must be imposed. The most common penalty, and the one that hurts the most and the quickest, is the withdrawal or withholding of state funds. All of the states have some provision for either total or partial withholding of state funds for specific violations of state law or other enforceable requirement--employment of noncertified teachers would be the most common example. One state, at least, has the legal power to revoke the administrative certificate of the superintendent or the principal for permitting certain types of violations of state law or SEA requirements within the district. That is a somewhat more direct approach than merely threatening loss of accreditation in the hope that public sentiment will, in time, bring about the necessary changes!

The ultimate sanction--that of direct state takeover of a delinquent and recalcitrant district--has apparently not been tried in the states visited, possibly just because there has been no occasion for such drastic action, or possibly because such action lacks statutory

justification. Although some states in other parts of the country do have the authority for such action, and have occasionally used it, the matter does not seem to have arisen in the Northwest.

II. Perceived Problems

The summary discussion of current practice, above, has in passing given some indication of the kinds of problems the Northwest states see--immediately down the road or dimly on the horizon--as they go about the business of school approval and accreditation. Because the existing programs are perceived as really going quite well, perhaps the term "problems" is not the right one; maybe we should speak of "concerns," or with even less urgency, of "things that ought to be thought about." Whatever the issues are called, interest in them appears to be at a fairly high level throughout the states visited.

Certainly, not every one of the states shares every one of the concerns, and the degree of concern varies with the individual state. But there are some common issues which were almost universally raised. Those which seem most significant are reported below.

1. Private schools. The question of the approval and/or accreditation of private schools keeps coming up not because--as some popular speakers and writers like to suggest--there is a public school bias against private education, nor yet because the SEAs want to control private schools. Most of the personnel in SEAs respect good private education; most of the SEAs have all they can do now to keep track of the public schools in the state. The problem is not with the openly-established, clearly-identified private schools; it is the burgeoning "cottage industry" in private education that is causing the

concern: "family schools," "home instruction," and allegedly "Christian" schools, all of which may be entirely legitimate, but many of which plainly are not.

State laws and regulations with respect to approval of private schools seem in some instances to have been left purposely vague, and in other instances seem to be purposely given a level of enforcement that might be called, to use that now discredited term, "benign neglect." It is easy to understand why this is so, and to be in sympathy with state legislatures and with state officials who wish the problem would just go away. It is an indisputably sensitive issue, once involving very emotional issues about the sanctity of the family, the freedom of religion, and the fears--justifiable fears--about the growing intrusiveness of government.

But the problem shows no sign of going away. The number of small, often hard-to-find and fly-by-night, private "schools" is growing at an unbelievably rapid rate. Their number could increase almost astronomically if a federal tuition tax credit should be enacted. Some of these schools are very good; some are passable; some are incredibly bad.

The state has two legitimate interests in giving some oversight to private schools: first, to protect the child against shoddy schooling and shabby treatment; and second, to protect the parent against blatant exploitation. The SEA has no reasonable choice except to get involved; but the options about how to get appropriately involved are wide open.

2. Costs of approval/accreditation. Costs of any program in education are receiving increasingly careful scrutiny at both state and local levels. There are personnel costs, time and travel costs,

paperwork costs, just to mention the most apparent ones. As accreditation/approval programs have become more comprehensive (increasingly and rightly including elementary and junior-high/middle-school grades, as well as the more traditional secondary school accreditation), more people and time are involved in the self-study process; the visitation teams get larger and more expensive; all the direct and indirect costs go up. As school approval requires compliance with more and more state laws and regulations, the paperwork burden grows. (It is not surprising that local districts look on the state education office with the same wan enthusiasm that SEAs have for the federal Department of Education.) The problem of costs, or at least the consciousness of costs, is heightened by the presence in some states of two systems of accreditation, state and association. Rightly or wrongly, the charges of overburden and redundancy are frequently made against state approval/accreditation programs.

3. The dual role of the SEA. Few would deny that the typical SEA has an "image problem" within its state because it has to have several images, not all of them readily compatible. This clouding of image shows up especially in the accreditation/approval area: the same SEA folks who are bringing you all of this helpful technical assistance are also the ones who are going to take back reports of your program deficiencies, or at least the ones who will be coming to see you again on the accreditation or standards approval team. It's like the principal of the small high school who is also the guidance counselor; it's hard to be both cop and confessor! Hard, but in this case not impossible, if the relationship between the two functions is clearly understood by both parties to accreditation, and both parties simply resolve to be as comfortable as possible with some residual ambiguity.

4. What to measure? For many years, the classic criticism of school accreditation has been that the process stresses conditions which exist rather than outcomes which are desired—in current terms, inputs rather than outputs. Despite significant improvements which have been made to move away from counting, classifying, and certifying what the school has (library books, square feet of laboratory space, properly certified teachers, written philosophy and objectives) to what it produces (students with desired competencies, achievements, attitudes), most approval/accreditation programs still measure things-as-they-are. This is a complex problem needing long-term resolution; simple shortcuts offer little hope. For example, one state has adopted a regulation which permits schools to become accredited solely on the basis of student test scores on standardized tests; if these scores at least match the state average, the school is considered quite acceptable in every respect. That system does measure an output, but a very narrow one.

III. Possibilities and Potentials

Out of the visits and discussions with the Chiefs and key staff members in the six Northwest states came a number of suggestions for potential new policy development. These are suggestions, not solutions; many of them are hunches, not yet backed by formal tryouts, much less rigorous research; none of them has been developed into a full-scale policy alternative. Like all true policy options, they neither state fundamental assumptions nor outline specific operating procedures; they merely suggest directions the policy makers might choose to go. A few of

the suggestions which seem to have the widest support, or to generate the most interest, are suggested below.

1. Give the private school approval/accreditation issue the highest possible priority, despite the difficulty and complexity of the political, emotional and educational issue involved. The state owes every student, wherever enrolled, reasonable assurance of a basically adequate--though by no means uniform--education.

2. Devote as much attention and energy to the accreditation of elementary and junior-high/middle-school grades as to the senior high school, which has been traditionally the recipient of most of the accreditation effort.

3. Lower the profile of the SEA as the chief enforcer in order that the agency may concentrate, and be perceived to concentrate, on its service and leadership functions. Suggestions received from the various Chiefs and SEAs visited for ways of accomplishing this change in outlook/appearance covered a very wide range: make all accreditation voluntary; have the state approve only, delegating all quality assurance activities to the local district; contract with outside agencies to do all of the accreditation activities; require the local district to submit written "assurances" of compliance, subject to spot-check whenever violations are suspected or reported. Most of these suggestions assume that accreditation and/or approval at the state level may not really be any longer necessary: there is now in existence a complex of forces working to keep schools doing their best. Community pride, staff expertise and professionalism, the increasing body of state law making specific programmatic requirements--all of these, it is asserted, will keep the school honest.

4. School improvement. As quickly as possible, shift the emphasis of approval/accreditation from being mere "approved," "standard," or "accredited" to being better. Let the community determine its own priorities, in the light of its own resource limitations; then let it set forth a plan of program improvement which stresses creative problem resolution, innovative programming, and striving toward excellence as understood and desired and accepted by the local community. (The Colorado system of "accreditation by contract" has demonstrated both the strengths and some of the weaknesses of such an approach.)

Conclusion

The potentials and possibilities for policy options given above, as well as the description of present practices and perceived problems, have two inescapable faults, when set forth for consideration by a diverse group of states. Some things reported simply aren't true for you; some things suggested you are already doing, and perhaps even better than anyone knows.

Nevertheless, out of the cooperative discussion among educational leaders of the region, and out of the materials presented here, the way may become clearer for each Chief and his staff to find new and better policy options, and to chart improved directions which will meet the state's own needs.